



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

April 25, 2006

Mr. Andrew Park
RCRA Programs Branch
U.S Environmental Protection Agency, Region II - Twenty Second Floor
290 Broadway Avenue
New York, NY 10007-1866

Re: DuPont Chambers Works Facility
Salem Canal IRM Pre-Design Work Plan, Response to Comments
Pennsville Township, Salem County

Dear Mr. Park:

The New Jersey Department of Environmental Protection (NJDEP) received the above referenced report dated November 30, 2005. The Department reviewed this document and has determined that it is acceptable with the following minor modifications:

1. Task 2C outlines three (3) wells that will be installed at the top, upper part and deep part of the "B" aquifer. The locations are shown on Figure 2. However, it is not clear from the text and the figure, which well corresponds to each depth in the "B" aquifer. DuPont must clarify this.
2. Task 2D discusses a pump test. DuPont proposed that MW G05-M02B would be used for this test. However, Figure 2 only shows a MW G05-P02B. DuPont must clarify if these are the same wells.
3. In task 2D, DuPont proposes a 24-hour pump test. DuPont needs to clarify the pump test will only be 24 hours. Usually a 72-hour pump test is conducted.
4. Page 2 (Section 1.3 Objectives and Scope of Work): DuPont should investigate/discuss the expected/conservative half-life of the chlorinated species in sediment given > 3% TOC and anaerobic conditions in 0-6" and deeper sediment intervals and likelihood of dilutive attenuation provided ground water is controlled.
5. Page 12 (Section 2.4.2 Sediment Delineation and Remedial Selection Report): It is stated that once the delineation is completed, and ecological evaluation will be conducted as part of the remedial action selection process. This evaluation will focus on sediments since surface water concentrations did not exceed screening values outside the boomed/silt curtain area.

The ecological evaluation should provide adequate discussion of historic SW sampling results to justify the sediment focus.

6. Page 13 (Section 2.4.3 Task 4A: Sediment Characterization): TOC is only specified for the surficial (0-6") sediment samples.

TOC analysis is required (Technical Requirements for Site Remediation) in all "biotic zone" samples (inclusive of 6"-12" proposed samples) and analysis is highly recommended in the deeper samples. This information may be of import in determining the persistence of deeper contaminant sediment "sources" (see comment for p. 2 above).

7. Figure 2: No Figure 2 was provided. This Figure shall be submitted.

If you have any questions, please contact me at (609) 984-4071 or e-mail at:
frank.faranca@dep.state.nj.us

Sincerely,

A handwritten signature in blue ink, appearing to read "Frank Faranca", is written over a horizontal line.

Frank Faranca, CHMM, Site Manager
Bureau of Case Management

C: Dave Doyle, DRMR/BEERA
Anne Pavelka, DRMR/BGWPA
Edward Demarest, DRMR/BEERA/ETRA